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November 28, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

**Re: WC Docket No. 05-196, Compliance Letter from Onvoy, Inc.**

Dear Marlene H. Dortch:

Enclosed please find the Compliance Letter from Onvoy, Inc. as required in WC Docket No. 05-196.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Glenn S. Richards

Glenn S. Richards  
Pillsbury Winthrop Shaw Pittman LLP

Attachment

cc: Kathy Berthot, Enforcement Bureau (by e-mail)  
Janice Myles, Wireline Competition Bureau (by e-mail)  
Best Copy and Printing, Inc. (by e-mail)

## **Onvoy, Inc.'s Compliance Report**

**November 28, 2005**

### **Background**

Onvoy is a regional telecommunications and internet services provider serving Minnesota's independent telephone companies, global interexchange carriers, enterprise clients and the State of Minnesota. Onvoy's two VoIP services fall with the FCC's definition of "interconnected VoIP service." Onvoy's VoIP network is a private, secure statewide (Minnesota) network for voice, video, internet access and private data. Onvoy sells its private VoIP solution to enterprise clients located in Minnesota. Onvoy's private VoIP solution has been E-911 compliant since its inception in 2001. Onvoy has approximately 250 VoIP enterprise customers.

Onvoy also offers wholesale a VoIP service that uses the internet and a broadband connection. This service requires a broadband connection and an Analog Telephone Adaptor (ATA) device. Users of this service can originate calls to the PSTN and receive calls from the PSTN. Onvoy provides E-911 capability with this service only at the end user's registered location.

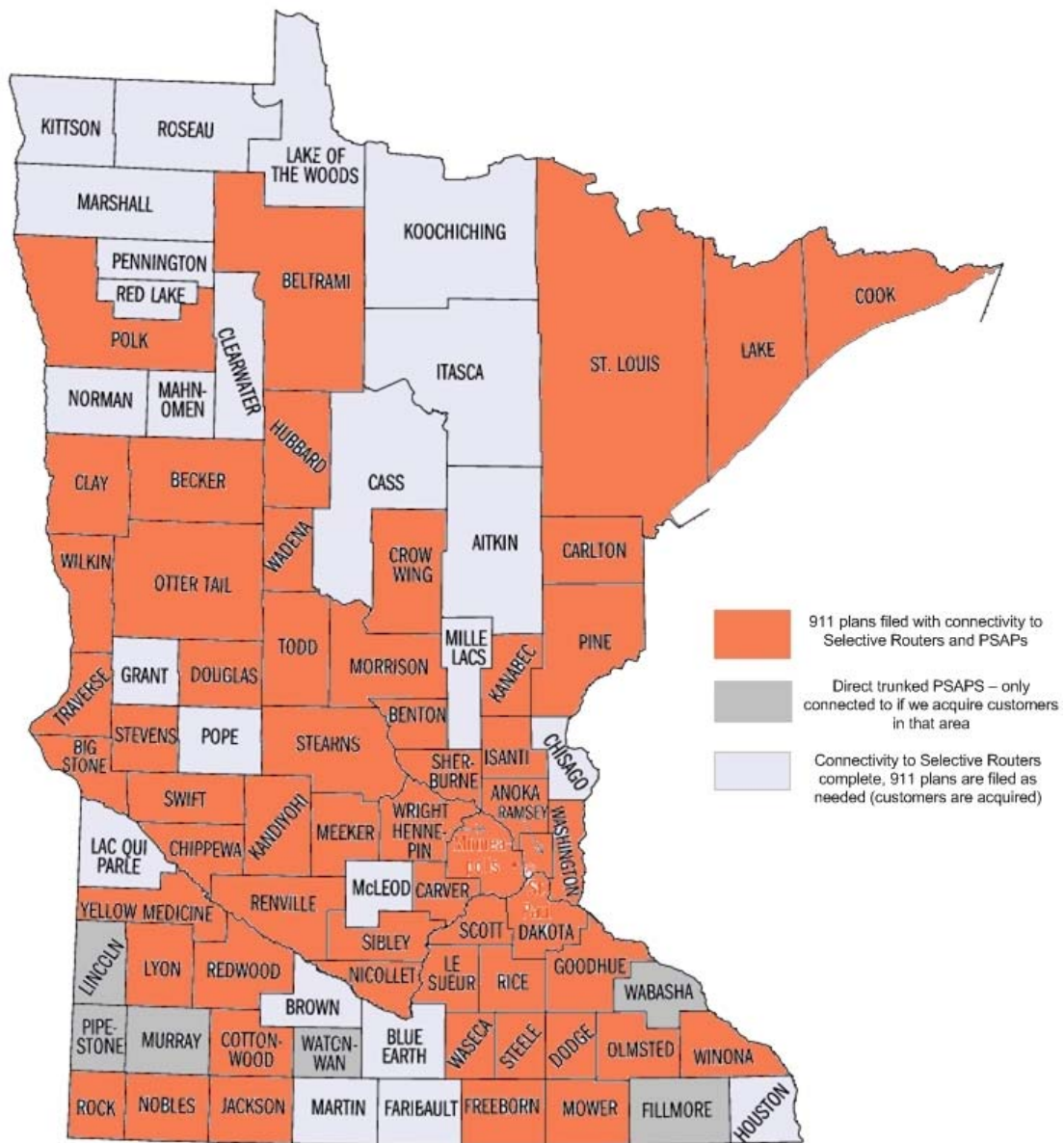
### **Compliance with 47 C.F.R § Part 9 – Interconnected Voice over Internet Protocol Services**

#### **Onvoy's 911 Solution:**

- Onvoy provides 911 services to its Voice over IP customers in the same manner 911 services are provided to customers subscribing to "traditional" voice services. Fully redundant physically diverse IP Softswitches are located in carrier class central office facilities. Should an Onvoy VoIP customer dial 911, the IP Softswitch will route the call to Onvoy's redundant PSTN connected gateways. From those gateways, the call will be transmitted over Onvoy's traditional PSTN switching infrastructure. Based on the calling number, the PSTN switch will route the 911 call over the correct trunk to the appropriate selective router maintained by Qwest or Independent Emergency Services (IES), both of which maintain connectivity to the majority of PSAPs throughout the state of Minnesota. The selective router then will route the call to the appropriate PSAP serving the customer's Registered Location.
- Onvoy also maintains its own E911 ALI database which contains the location information for all customers (subscribing to VoIP or traditional voice services). Changes to information contained in the Onvoy E911 ALI database are communicated daily to IES and Qwest, the two ALI database providers in Minnesota.

- Onvoy maintains fully redundant, diverse path DS1s for connectivity to all twelve Selective Routers in the State of Minnesota.
- Onvoy can currently provide E911 call completion with the caller's correct ANI with the Automatic Location Identification database accurately reflecting the Registered Location for 100% of our customers. Onvoy provides address validation prior to populating information in the E911 database via the Master Street Address Guide (MSAG).
- Onvoy only provides Voice over IP services in locations where Onvoy can provide E911 call completion in the manner identified above. Requests for VoIP services outside of Onvoy's local voice service footprint are denied.
- **Transmission of ANI and Registered Information:** Onvoy routes all 911 calls through the use of ANI via the dedicated wireline E911 network in Minnesota. The information below was specifically requested by the Commission:
  - 100% of answering points within Onvoy's local service area in Minnesota are capable of receiving and processing ANI and Registered Location
  - 100% of Onvoy's VoIP subscribers have their ANI and Registered Location transmitted to answering points that are capable of receiving and processing this information.
  - 0% of Onvoy's VoIP subscribers are located in an area where Onvoy is not transmitting the ANI and Registered Location on a 911 call to answering points that are capable of receiving this information.
- **911 Coverage:**

The following map indicates Onvoy's 911 coverage within its local service footprint.



- Counties in orange are counties in which Onvoy currently has connectivity to the Selective Routers and associated PSAPs.
- Counties in light grey are counties in which Onvoy has connectivity to the Selective Routers, but where Onvoy has not yet filed 911 plans with the Minnesota PUC. Plans are filed and updated with the PUC and the Minnesota 911 Program as customers are added in new 911 service areas.
- Counties in dark grey are supported by direct trunked PSAPs, meaning those PSAPs have no connectivity to the Selective Routers in the State. Again, if Onvoy obtains customers in one of these areas, connectivity to the appropriate PSAP and regulatory filings would be made.

Onvoy has no customers located in the counties colored in light or dark grey. Onvoy does not and has never provided services in locations where E911 call completion is not available.

### **Obtaining Initial Registered Location Information**

Onvoy reports that all of its existing subscribers for VoIP service were required to provide registered location information prior to service turn-up. Onvoy will continue this practice for all new customers. From the time it began offering VoIP service Onvoy offered 911 service and required all new customers in the implementation process to provide location information for all of its end users. In summary, Onvoy has always reached 100% in obtaining registered location information from existing customers.

### **Obtaining Updated Registered Location Information:**

Onvoy provides end users one or more methods of updating their registered location.

- Onvoy end users can call using their VoIP phone Onvoy's Customer Care toll free number and provide updated location information. The toll free number is: 1-877-99ONVOY or 1-877-996-6869.
- Onvoy end users can update their location information via the internet at: <https://zone.onvoy.com/webportal/onvoyPortal.jsp>. A login is required; once inside, a user is prompted for updated information via a user friendly web template that will e-mail the updated information to Onvoy Customer Care's trouble ticketing system. The user requesting the update will automatically be e-mailed a ticket number to track the status of their request.
- A trouble ticket can also be opened by business customers on-line. Customer administrators have online access to track the ticket status, and add notes to the ticket.
- Subscribers can also e-mail Onvoy Customer Care directly at [customercare@webrt.lan.onvoy.com](mailto:customercare@webrt.lan.onvoy.com), available as a hotlink on various webpages and receive an automatic ticket number to track their request.

All updated information provided to Onvoy is loaded into the ALI database in a timely manner.

### **Technical Solution for Nomadic Subscribers:**

Onvoy currently has 16,308 telephone numbers loaded into its VoIP switching infrastructure. Of those, 44 have the capability to be nomadic (20 of which are Onvoy employees). All existing subscribers and new customers activating new service sign a detailed letter describing Onvoy's capabilities and limitations regarding E911 service. This information is also available online at

<http://postcards.onvoy.com/911/info.html> .

One limitation of Onvoy's 911 capabilities is Onvoy can only support E911 call completion with ANI and ALI database information in areas where Onvoy provides local service. The following link lists the areas where Onvoy provides local service:  
[http://postcards.onvoy.com/911/local\\_service\\_areas.pdf](http://postcards.onvoy.com/911/local_service_areas.pdf)

Onvoy is currently evaluating methods to offer E911 call completion outside of its service footprint but have run into several limiting factors. One, the service coverage of national providers is not 100% (80% is the highest found). Second, national call completion services tend to be prohibitively expensive for smaller carriers. A recent proposal Onvoy received and is evaluating has a minimum monthly recurring charge of \$9,000.00, with a \$45,000.00 possible monthly recurring charge for all of Onvoy's 911 database and call completion services. This charge puts a significant burden on smaller service providers such as Onvoy.

### **Proposed "Heartbeat" type Solutions**

Onvoy would like to comment on AT&T's proposed "Heartbeat Solution" and others similar measures that have been proposed. The Commission has recognized the lack of a solution to automatically identify an end users location as a result of limits of the current technology. The "Heartbeat Solution" does not positively identify the end users location, leaving the requirement of physical location confirmation subject to the end user. Putting an automatic intercept on a customer's line and suspending service is excessive and would prevent the placement of other priority calls such as calls to medical facilities, poison center, and non emergency police calls.

The automatic intercept of calls when an interruption of the end user "heartbeat" is detected may also cause excessive interruption of service for many reasons not associated with a change in location. Power outages, the uncertainties of the public internet, or even service degradation from internet traffic congestion could cause repeated and excessive interruptions in service for users that have not changed locations.

Finally, Onvoy would like to point out the differences between a residential class VoIP service and a business class VoIP service. The vast majority of Onvoy customers are business class VoIP subscribers, served over a private IP, Quality of Service network. These business subscribers are often in high density locations with hundreds of subscribers per location. In a traditional telephony world, the business telephone administrator would be responsible to maintain ALI information and for sending the updates to the service provider. Applying a "Heartbeat" solution to VOIP business customers seems to be excessive by shifting the requirement to the end user, rather than the employer's telecommunications/local area network administrator.

Onvoy currently has a limited "Heartbeat" solution that is less restrictive than that employed by AT&T as described in its October 7<sup>th</sup>, 2005 Ex Parte letter to the Commission. This limited "Heartbeat" solution will only apply to Onvoy's wholesale

VoIP solution. If an Onvoy subscriber's ATA is unreachable for 72 hours, the subscriber must contact Onvoy to reactivate service. Onvoy is developing an automatic notification of loss of "Heartbeat" in a timeframe under 72 hours. Rather than removing service capability, Onvoy's solution will e-mail the customer regarding the loss of contact and provide instructions on how to update location information and a description of the limitations of service. The "reply-to" e-mail address will correspond with Onvoy's trouble ticketing system. End users who reply with updated 911 location information will automatically generate a ticket with Onvoy Customer Care, and a "bounced" e-mail will also create a ticket indicating additional steps need to be taken to contact the end user and verify contact information. Onvoy expects to implement this service in January 2006.

**Contact Information for Onvoy Concerning Compliance with the FCC's VoIP E911 Order:**

The contact person for Onvoy's compliance with the FCC's VoIP E911 Order is:

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